

Adcomm Engineering Company

Communications and Electronics Engineers

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MAR 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 22, 1993

Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

Dear Secretary:

Please find enclosed supplemental information regarding our
Petition for Rule Making (RM-8143). We feel these are provide
important additional information in the proceedings.

Sincerely,


Joe Blaschka Jr., P.E.

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BEFORE THE
Federal Communications Commission

Washington, D.C. 20554

MAR 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Part 68 of the
Commission's Rules to Define
Effective Means for Interworking
of Customer Premise Equipment and
Public Enhanced 9-1-1 Systems

RM - 8143

To: The Commission

M. 21

FCC 13-1-10

ADDITIONAL COMMENTS ON THE
PETITION FOR RULE MAKING
OF ADCOMM ENGINEERING COMPANY

ADCOMM ENGINEERING COMPANY

Joseph P. Blaschka, Jr., PE

14631 North Avenue E.

Kirkland, WA 98034

206 821-8827

EXPIRES 5/26/93

A Private Party

Dated: February 22, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS

These comments are intended as supplementary information to the Petition, and primarily address recent developments.

The Petition submitted by Adcomm Engineering for modification of CFR 47 asks for establishment of a common technical approach to caller identification between CPE and the network for calls placed to emergency number 9-1-1 in areas with "enhanced" (E) 9-1-1 systems. Uniformity of approach is necessary to avoid the cost and risk to safety posed by variations in CPE design.

The immediacy and notoriety of the caller-location problem is causing some local governments to adopt a variety of regulations in an attempt to cause CPE users to make their systems fully compatible with (E)9-1-1 in their area. This will complicate development of a solution and we request that the Commission preempt this local regulation of CPE.

Many of the comments contained in the Reply Comments to our original petition and to the comments of other Reply Comments request that the Commission delay action on this matter until an industry consensus is obtained. We urge caution on this matter and recommend that if the Commission does delay any implementation that it put a specific time

limit on the industry. We believe this time limit should be no longer than three months or no later than June 1, 1993.

Local municipalities are passing ordinances restricting the installation of equipment that is not Enhanced 9-1-1 compatible. We have attached a sample ordinance that is representative of those passed locally. Several counties and municipalities are waiting to see what the Commission's actions will be. We believe that if they perceive a substantial delay in Commission action, these local governments will pass similar ordinances. This will severely restrict the ability of telephone equipment manufacturers to install equipment in many areas of the State of Washington.

As part of the statewide PBX/STS work that is being done, comments were solicited from dispatch centers about this problem. We have attached copies of several comments from dispatchers at the "SNOPAC" dispatch center located in Everett, Washington. These will be representative of those from any major urban Enhanced 9-1-1 center.

The comments from the North American Telecommunications Association (NATA) indicate a strong concern about the costs of the service, database issues, and administration. We believe these are local matters and are outside the

jurisdiction of the Commission. These matters will be handled locally by state utilities commissions and by local governments. However, we believe the control of what is connected to the Public Switched Telephone Network (PSTN) is the responsibility of the Commission and not local government. We believe a greater concern is the proliferation of local ordinances restricting the installation of many types and manufacturers of equipment. We urge the Commission to move quickly to establish the technical requirements for interface to (E)9-1-1 systems.

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that on this 22nd day of February, 1993, a true and correct copy of the foregoing Reply Comments and previous Reply Comments was mailed first-class postage prepaid, to:

William B. Barfield
Thompson T. Rawls II
Bellsouth Telecommunications, Inc.
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, Georgia, 30367-6000

Daniel L. Bart
GTE Service Corporation
1800 M Street, N.W.
Suite 1200
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Robert M. Gurss
Wilkes, Artis, Hedrick & Lane,
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1666 K Street, N.W.
Washington, D.C. 20006

Albert H. Kramer
Robert F. Aldrich
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1201 New York Avenue, N.W.
Washington, D.C. 20005

Michael D. Lowe
Lawrence W. Katz
1710 H Street, N.W.
Washington, D.C. 20006

New York Telephone Company
Mary McDermott
120 Blomingdale Road
White Plains, NY 10605

J. Hal Berge
Telecommunications Industry Assoc.
2001 Pennsylvania Ave.
Suite 800
Washington, D.C. 20006

23 WHEREAS, IT IS CRITICAL TO THE HEALTH, SAFETY AND WELFARE OF THE CITIZENS
24 OF THURSTON COUNTY THAT ALL CITIZENS HAVE A TELEPHONE SYSTEM WHICH ALLOWS THEIR
25 PBX SYSTEMS TO PROPERLY INTERFACE WITH THE E-911 SYSTEM AND THAT THESE SYSTEMS
26 PROVIDE BOTH AUTOMATIC CALLER IDENTIFICATION AND SELECTIVE ROUTING TO THE
27 APPROPRIATE PUBLIC SAFETY ANSWERING POINT; NOW, THEREFORE,

28 THE _____ DOES HEREBY ORDAIN AS FOLLOWS:

29 SECTION 1. THE _____ CODE IS AMENDED TO ADD THE FOLLOWING NEW CHAPTER:

30 CHAPTER XX.XX

31 ENHANCED 911 (E911) SERVICE.

32 SECTION 1. TITLE. THIS ORDINANCE SHALL BE KNOWN AND MAY BE CITED AS THE
33 _____ E-911 ORDINANCE.

34 SECTION 2. DECLARATION OF POLICY AND INTENT.

35 A. IT IS DECLARED TO BE THE POLICY OF THE _____, IN THE EXERCISE OF
36 ITS POLICE POWERS FOR THE PROTECTION OF THE PUBLIC HEALTH, SAFETY AND GENERAL
37 WELFARE, THAT ALL OF THE CITIZENS OF _____ HAVE A TELEPHONE SYSTEM WHICH
38 ALLOWS THEIR PBX SYSTEM TO PROPERLY INTERFACE WITH THE E-911 SYSTEM AND THAT
39 THESE SYSTEMS PROVIDE BOTH AUTOMATIC CALLER IDENTIFICATION AND SELECTIVE ROUTING
40 TO THE APPROPRIATE PUBLIC SAFETY ANSWERING POINT. IT IS THE INTENT OF THE
41 _____, IN THE IMPLEMENTATION OF THIS ORDINANCE, THAT ALL
42 TELEPHONE SYSTEMS PROVIDE SERVICE THAT WILL INTERFACE WITH THE E-911 SYSTEM TO
43 PROVIDE THESE BENEFITS TO ALL CITIZENS.

DRAFT

PBX ORDINANCE DRAFT

2 WHEREAS, THE E-911 SYSTEM HAS PROVEN ITS LIFESAVING BENEFITS TO THE
3 CITIZENS OF _____ BECAUSE IT ALLOWS THE TELECOMMUNICATOR ANSWERING AN
4 EMERGENCY CALL (THE PUBLIC SAFETY ANSWERING POINT) TO AUTOMATICALLY LOCATE THE
5 CALLER; AND

6 WHEREAS, IN SOME CASES THESE CALLERS CANNOT BE AUTOMATICALLY LOCATED
7 BECAUSE THEIR CALLS ARE MADE FROM TELEPHONES ATTACHED TO PRIVATE BRANCH
8 EXCHANGES OR SIMILAR EQUIPMENT (PBX SYSTEMS); AND

9 WHEREAS, THIS PROBLEM CAN BE LIFE-THREATENING WHEN THE CALLER IS UNABLE
10 TO IDENTIFY HIS OR HER EXACT LOCATION AND THE EMERGENCY TELECOMMUNICATOR CANNOT
11 AUTOMATICALLY LOCATE THE CALLER; AND

12 WHEREAS, THE PROLIFERATION OF THESE PBX SYSTEMS IS CONTINUALLY
13 INCREASING AND BECAUSE OF THIS PROLIFERATION THE HEALTH AND SAFETY OF AN
14 INCREASING NUMBER OF CITIZENS IS JEOPARDIZED; AND

15 WHEREAS, THE CITIZENS WHO ARE SERVICED BY PBX TELEPHONE SYSTEMS MAY BE
16 DENIED THE MOST IMPORTANT BENEFIT OF THE E-911 SYSTEM, THE AUTOMATIC NUMBER
17 AND LOCATION INFORMATION, AND MAY HAVE THE ERRONEOUS BELIEF THAT THIS SERVICE IS
18 PROVIDED TO THEM; AND

19 WHEREAS, THE STATE OF WASHINGTON HAS REQUIRED THAT BY SEPTEMBER 1,
20 1992 ALL LOCAL EXCHANGE COMPANIES PROVIDE AN INTERFACE BETWEEN ALL PBX SYSTEMS
21 AND E-911 WHICH WILL RESULT IN THE CALLER'S NUMBER AND LOCATION BEING
22 AUTOMATICALLY ROUTED TO THE APPROPRIATE PUBLIC SAFETY ANSWERING POINT; AND

44 B. IT IS FURTHER DECLARED THAT THE AVAILABILITY OF SUCH PRODUCTS OR
45 SERVICES IS CRITICAL TO THE HEALTH, SAFETY AND WELFARE OF THE GENERAL PUBLIC, AND IS
46 ALSO NECESSARY TO PROVIDE AN EFFECTIVE MEANS FOR _____ FIRE, MEDICAL AND POLICE
47 UNITS TO EFFICIENTLY LOCATE AND PROMPTLY RESPOND TO ANY EMERGENCY.

48 C. THE EXPRESS PURPOSE OF THIS ORDINANCE IS TO PROVIDE FOR AND PROMOTE
49 THE HEALTH, SAFETY AND WELFARE OF THE GENERAL PUBLIC, AND NOT TO PROTECT
50 INDIVIDUALS OR CREATE OR OTHERWISE ESTABLISH OR DESIGNATE ANY PARTICULAR CLASS OR
51 GROUP OF PEOPLE WHO WILL OR SHOULD BE ESPECIALLY PROTECTED OR BENEFITTED BY THE
52 TERMS OF THIS ORDINANCE. THE OBLIGATION OF COMPLYING WITH THE REQUIREMENTS OF
53 THIS ORDINANCE AND THE LIABILITY FOR FAILING TO DO SO IS HEREBY PLACED UPON THE
54 OWNERS OR PERSONS RESPONSIBLE FOR THE CONDITIONS OF THE BUILDINGS OR PREMISES.

55 SECTION 3. DEFINITIONS. FOR THE PURPOSES OF THIS ORDINANCE, CERTAIN
56 WORDS, TERMS, PHRASES AND THEIR DERIVATIONS SHALL BE CONSTRUED AS SPECIFIED IN
57 THIS ORDINANCE.

58 A. "ALI" MEANS AUTOMATIC LOCATION IDENTIFICATION, INCLUDING BUT NOT
59 LIMITED TO THE CALLER'S TELEPHONE NUMBER, THE CLASS OF PHONE SERVICE (RESIDENCE,
60 BUSINESS, COIN, PBX, ETC.), THE DATE AND TIME OF THE CALL, THE CALLER'S NAME,
61 ADDRESS AND CITY, THE ROUTING CODE OF THE CALL, THE PILOT NUMBER, AND THE PORT OR
62 TRUNK ON WHICH THE CALL IS RECEIVED. IT ALSO INCLUDES THE NAME OF THE PSAP AND
63 THE AGENCIES THAT ARE RESPONSIBLE FOR POLICE, FIRE OR MEDICAL RESPONSE TO THAT
64 ADDRESS.

65 B. "ANI" MEANS THE UNIQUE NUMBER IDENTIFIED WITH THE CALLING PARTY'S
66 PHONE.

67 C. "E-911 TELEPHONE SYSTEM" MEANS A PUBLIC TELEPHONE SYSTEM
68 CONSISTING OF A NETWORK, DATA BASE, AND ON-PREMISES EQUIPMENT THAT IS ACCESSED BY
69 DIALING 911 AND THAT ENABLES REPORTING POLICE, FIRE, MEDICAL OR OTHER EMERGENCY
70 SITUATIONS TO A PUBLIC SAFETY ANSWERING POINT. THE SYSTEM INCLUDES THE CAPABILITY
71 TO SELECTIVELY ROUTE INCOMING 911 CALLS TO THE APPROPRIATE PUBLIC SAFETY
72 ANSWERING POINT THAT OPERATES IN A DEFINED 911 SERVICE AREA AND THE CAPABILITY TO
73 AUTOMATICALLY DISPLAY THE NAME, ADDRESS, AND TELEPHONE NUMBER OF INCOMING 911
74 CALLS AT THE APPROPRIATE PUBLIC SAFETY ANSWERING POINT.

75 D. "PRIVATE BRANCH EXCHANGE SYSTEM (PBX) " MEANS A PRIVATE TELEPHONE
76 SWITCHING SYSTEM, LOCATED ON A CUSTOMER'S PREMISES AND CONNECTED TO A COMMON
77 CROUP OF INCOMING LINES, THAT PROVIDES SERVICE TO A NUMBER OF INDIVIDUAL TELEPHONE
78 SETS.

79 E. "SELECTIVE ROUTING" MEANS THE FUNCTION OF TELEPHONE SERVICE WHICH
80 DIRECTS THE CALL TO THE PROPER PSAP, BASED UPON THE CALLING PARTY'S ADDRESS.

81 SECTION 4. SCOPE. THIS ORDINANCE SHALL APPLY TO ALL BUILDING,
82 APPURTENANT STRUCTURES AND PREMISES LOCATED IN THE _____ INCLUDING: (1) THOSE
83 STRUCTURES WITHIN WHICH PBX SYSTEMS ARE PRESENTLY INSTALLED; (2) THOSE
84 STRUCTURES HEREINAFTER CONSTRUCTED IN WHICH TELEPHONE SYSTEMS ARE INSTALLED;
85 AND (3) THOSE STRUCTURES WHICH ARE HEREAFTER ALTERED, REHABILITATED OR REPAIRED
86 IN WHICH TELEPHONE SYSTEMS ARE INSTALLED.

87 SECTION 5. SPECIFIC LOCATION AND PHONE NUMBER INFORMATION REQUIRED.

88 A. OWNERS AND OPERATORS OF PBX SYSTEMS SHALL CONFIGURE THEIR
89 TELEPHONE SYSTEMS SO THAT EACH PBX STATION LINE THAT HAS LOCAL ACCESS WILL
90 PROVIDE LINE-SPECIFIC LOCATION AND PHONE NUMBER INFORMATION TO THE THURSTON
91 COUNTY E-911 SYSTEM. IN THIS WAY EVERY BUILDING, APPURTENANT STRUCTURE OR
92 PREMISE WITHIN THE _____, WHERE A TELEPHONE SYSTEM IS PRESENTLY INSTALLED, OR
93 WHICH WILL BE HEREAFTER INSTALLED, SHALL HAVE TELEPHONE SERVICES WHICH WILL

94 PROPERLY INTERFACE WITH THE E-911 SYSTEM BY MAKING THE FOLLOWING ALI-ANI
95 INFORMATION AVAILABLE TO THE PSAP WHEN ANY PARTY WITHIN THE SYSTEM CALL 9-1-1:

- 96 1. NAME
- 97 2. SPECIFIC ADDRESS AND LOCATION
- 98 3. TELEPHONE NUMBER
- 99 4. CITY.

100 B. THE PROVISIONS OF THIS CHAPTER SHALL APPLY TO ALL NEW BUILDING,
101 APPURTENANT STRUCTURES AND PREMISES AND TO ALL SUCH STRUCTURES HEREAFTER
102 ALTERED, REHABILITATED OR REPAIRED. ALL BUILDING PERMITS OBTAINED AFTER
103 SEPTEMBER 1, 1992 SHALL REQUIRE CERTIFICATION THAT THE TELEPHONE SYSTEM IS
104 CAPABLE OF PROVIDING LINE-SPECIFIC TELEPHONE NUMBER AND LOCATION INFORMATION.
105 THIS MUST BE DEMONSTRATED BEFORE A CERTIFICATE OF OCCUPANCY IS GRANTED.

106 C. ALL EXISTING BUILDINGS, APPURTENANT STRUCTURES AND PREMISES WITH
107 PBX SYSTEMS PRESENTLY INSTALLED SHALL REQUIRE CERTIFICATION THAT THE TELEPHONE
108 SYSTEM IS CAPABLE OF PROVIDING LINE-SPECIFIC TELEPHONE NUMBER AND LOCATION
109 INFORMATION BY JULY 1, 1995.

110 D. OWNERS AND OPERATORS OF PBX SYSTEMS SHALL PROVIDE TIMELY RECORD
111 UPDATES TO THE E-911 DATA BASE.

112 SECTION 6. ENFORCEMENT

113 A. THE PROVISIONS OF THIS CHAPTER AND ANY RULES AND REGULATIONS
114 PROMULGATED THEREUNDER SHALL BE ENFORCED BY THE FIRE MARSHALL IN ACCORDANCE
115 WITH THE ENFORCEMENT AND PENALTY PROVISIONS OF _____ CODE _____.

116 B. THE FIRE MARSHALL IS AUTHORIZED TO ADOPT RULES AND REGULATIONS THAT
117 ARE NECESSARY TO IMPLEMENT THE REQUIREMENTS OF THIS ORDINANCE AND TO CARRY OUT
118 THE DUTIES HEREUNDER.

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SECTION 7. FEES.

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A. NO FEES SHALL BE CHARGED FOR INSPECTION OF BUILDINGS, APPURTENANT
STRUCTURES OR PREMISES FOR COMPLIANCE WITH THIS ORDINANCE, IF SUCH INSPECTION IS
CARRIED OUT IN CONJUNCTION WITH ANY REQUIRED INSPECTION UNDER THE _____ BUILDING
AND FIRE CODES.

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B. FEES MAY BE CHARGED FOR INSPECTING SYSTEMS IN STRUCTURES THAT WERE
CONSTRUCTED PRIOR TO THE ENACTMENT OF THIS CHAPTER.

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SECTION 8. LIABILITY. NOTHING CONTAINED IN THIS ORDINANCE IS INTENDED TO
BE NOR SHALL BE CONSTRUED TO CREATE OR FORM THE BASIS FOR ANY LIABILITY ON THE PART
OF THE _____, OR ITS OFFICERS, EMPLOYEES OR AGENTS, FOR ANY INJURY OR DAMAGE
RESULTING FROM THE FAILURE OF ANY OWNER OF PROPERTY OR LAND TO COMPLY WITH THE
PROVISIONS OF THIS ORDINANCE, OR BY REASON OR IN CONSEQUENCE OF ANY INSPECTION,
NOTICE, ORDER CERTIFICATE, PERMISSION OR APPROVAL AUTHORIZED OR ISSUED OR DONE IN
CONNECTION WITH THE IMPLEMENTATION OR ENFORCEMENT OF THIS ORDINANCE, OR BY
REASON OF ANY ACTION OR INACTION ON THE PART OF THE _____ RELATED IN ANY MANNER
TO THE ENFORCEMENT OF THIS ORDINANCE BY ITS OFFICERS, EMPLOYEES OR AGENTS.

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SECTION 9. SEVERABILITY. THE PROVISIONS OF THIS ORDINANCE ARE
DECLARED TO BE SEPARATE AND SEVERABLE. THE INVALIDITY OF ANY CLAUSE, SENTENCE,
PARAGRAPH, SUBDIVISION, SECTION OR PORTION OF THIS ORDINANCE, OR THE INVALIDITY OF
THE APPLICATION THEREOF TO ANY PERSON OR CIRCUMSTANCE SHALL NOT AFFECT THE
VALIDITY OF THE REMAINDER OF THIS ORDINANCE, OR THE VALIDITY OF ITS APPLICATION TO
OTHER PERSONS OR CIRCUMSTANCES.

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SECTION 10. EFFECTIVE DATE -- STATE OF EMERGENCY. AS STATED IN THE
PREAMBLE TO THIS ORDINANCE, THE PROBLEM THAT THIS ORDINANCE SEEKS TO REMEDY IS
HEALTH AND SAFETY RELATED, AND POTENTIALLY LIFE-THREATENING. IT IS IN THE BEST
INTERESTS OF THE PUBLIC THAT NO FURTHER DEVELOPMENT TAKE PLACE IN _____ WHICH
CONTAINS TELECOMMUNICATIONS INCOMPATIBLE WITH E-911, OR THAT WOULD CONTRIBUTE
TO THE PROBLEM DEFINED IN THIS ORDINANCE, SINCE POST-CONSTRUCTION CORRECTION MAY

147 BE TECHNOLOGICALLY DIFFICULT AND EXPENSIVE. THIS ORDINANCE, THEREFORE, IS
148 NECESSARY FOR THE IMMEDIATE PRESERVATION OF PUBLIC PEACE, HEALTH AND SAFETY, AND
149 SHALL TAKE EFFECT AND BE IN FORCE AND EFFECT FIVE (5) DAYS FROM THE TIME OF ITS FINAL
150 APPROVAL AND PASSAGE AS PROVIDED.

SNOPAC Personnel provided the following comments when asked "describe problems that PBX phone systems create for 9-1-1 calls; for example, the 9-1-1 call receiver determining the correct address of the incident".

1. When a 9-1-1 hang up call is received the caller is unable to tell us if there is a problem or where it is located on our call back.
2. We received a call from the Everett School District with a 259 telephone number. When we called back, the person answering was unaware of any 259 telephone numbers and said their telephone numbers were all 388. This creates confusion.
3. The PBX caller is unable to tell us the problem because they are told to call by another party - no first hand info. Example: Tramco - sometimes the caller doesn't know the location of the problem or what entrance should be used.
4. Using a PBX to make overseas calls. Boeing, for example, must use a 9-1 combination. If we receive a 9-1-1 hang up and call back, the operator doesn't know if there is a problem or where.
5. We know not to rely on the information displayed if the number shows a PBX. I treat these calls as not having any display at all - defeats the whole system!
6. It is impossible to tell where a call came from through a PBX. I treat the call (same as above).
7. I agree (with 5 & 6). Example: Covington Farms Apts. It would be stupid to send an officer to check over 600 apartment units.
8. I agree (with 5 through 7). Why send an officer to a PBX complex? When a call back is attempted, the person answering has no idea if there is a problem or where a call came from.
9. Some PBX numbers are answered by a central operator who has no idea where a call came from or what building. Example: GTE, Boeing, Covington Farms Apts. Waste of police officers' time to even respond.
10. Some of the apartment complexes in south county are ATM. There is a 1-800 number you can call and they can trace the call with the time the call was received (such as our old GTE line traces). Otherwise, from PBX's (GTE, school districts, etc.) it is useless to call back.
11. PBX phone systems do cause problems with getting accurate and quick response to citizens. Most of the time the address is not the correct one and if

there is no answer (hang ups) we cannot verify the correct address and could send officers to an incorrect location, tying up the officers' time and delaying response to more pressing calls.

12. PBX calls only provide the base number the phone service is listed to. They do not give unit or apartment numbers. The bigger the complex, the more area that has to be checked and, in most cases, the agencies do not have the resources. Example, we received a report from two brothers fighting at the Admiralty Terrace Apts. in south county. The boys were 8 and 12 years old and did not know their apartment number. We did not locate them. Example: A Shell gas station on Hwy 99 has a PBX with its sister station on 19th Ave. SE. One night there was a disturbance at the station on 19th and our display showed the station on Hwy 99 (9-1-1 hang up). Officers were dispatched to the wrong station based on the PBX information. Example: GTE Northwest has a PBX that serves several offices. When a 911 hang up occurs, we often don't know where the call came from. PBX's are a hazard and a liability waiting for something to happen.